

firstdate

Firstdate Privacy Policy

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*This Privacy Policy (this "**Policy**") is effective as of January 1, 2020 (the "**Effective Date**")*

*In this statement, the words "**Firstdate**", "**we**", "**our**", the "**Company**", and "**Business**" refer to Firstdate, Inc. and its affiliates and related companies. The words "**you**" and "**your**" refer to our customers, prospective customers, and anyone who visits our website, engages with our services and otherwise provides personal information to Firstdate. The phrases "**information**" and "**personal information**" mean any factual or subjective information about an identifiable individual, but does not include business contact information used for contacting the information to matters relating to their jobs.*

You must be 18 years of age or older to use Firstdate's Services.

1. Introduction

Thank you for visiting Firstdate's website. Your privacy is important to us. This Policy explains our information practices and the choices you can make about the way your information is collected and used. If you have any questions, do not hesitate to contact us using the information set out in Section 11 entitled "Customer inquiries & CPO contact".

2. Firstdate Platform, Partner Hosts and Sharing Information with Partner Hosts

Firstdate wants to create a realistic environment to meet people and we know everyone's time is valuable, so we want to do this in a safe way and in an efficient manner that doesn't lose the eye contact, personal touch and chemistry. So, Firstdate developed a leading proprietary software platform that promotes a realistic video meeting place for people interested in meeting other people that enables such first meetings and first impressions to occur over only a few minutes ("**Video Speed Dating Events**"). Firstdate partner hosts the Video Speed Dating Events with third parties ("**Partner Hosts**"). The Partner Hosts will market the Video Speed Dating Events, along with Firstdate or on their own. The Video Speed Dating Events may be branded using the Partner Hosts' names with or without Firstdate. Participants of the Video Speed Dating Events sign up using Firstdate's platform.

What's important for you to know is that the information that is collected on the Firstdate Platform for a particular Video Speed Dating Event is shared with the Partner Host for that event. The purposes of sharing the information with the Partner Host is for the Partner Host to communicate with you about your experience during the Video Speed Dating Event and about upcoming events you may be interested in based on the information in your profile and preferences. If you do not want the Partner Host to communicate with you, for any reason, please reach out and let the Partner Host know. This sharing is in addition to other disclosures set out in the privacy policy herein.

We have contractual provisions in place to ensure the Partner Host: (i) limits its use of the information to those purposes set out above and as otherwise permitted or required by law; (ii) secures the information; (iii) respects any "opt-out" requested by you; and (iv) otherwise complies with the law.

3. What information we collect

Firstdate collects the Personal Information we need for the purposes stated in this Policy and as otherwise permitted or required by law. We may collect the following types of Personal Information about you:

- **Identification and contact details**, such as name, gender, date of birth, marital status and contact information (e.g. address, telephone number, and email address);
- **Account information**, such as login credentials, username and passwords;
- **Dating Related Information**, such as personality, lifestyle, interests, racial or ethnic origin, religious beliefs, gender identification, sexual orientation, and dating preferences as well as other and additional information that you share with us, such as details on your dating preferences, as well as content such as photos and videos. To add certain content, like pictures or videos, you may allow us to access your camera or photo album. Some of the information you choose to provide us may be considered “special” or “sensitive” in certain jurisdictions, for example your racial or ethnic origins, sexual orientation and religious beliefs. By choosing to provide this information, you consent to our processing of that information;
- **Social media information**, including login information, Facebook user ID, gender, birthday, email address, and name for the Facebook account that you connect to your Firstdate account
- **Financial information** such as your debit or credit card number, billing address and credit card verification value;
- **Usage information** such as information about your activity on our services, including how you use our services (e.g. date and time you logged in, features you’ve been using, searches, advertising that you click on) and your interaction with other users (e.g. users you interact with, time and date of exchanges, and messages you send and receive);
- **Video Information**, including copies of all written and video interactions you have with other users through Firstdate. To video chat with other users, you may allow us to access your camera;
- **Device information** including hardware and software information such as IP address, device ID and type, device-specific and apps settings and characteristics, app crashes, advertising IDs (such as Google’s AAID and Apple’s IDFA, both of which are randomly generated numbers that you can reset by going into your device’s settings), browser type, version and language, operating system, time zones, identifiers associated with cookies or other technologies that may uniquely identify your device or browser (e.g., IMEI/UDID and MAC address). If you use a mobile device to access or download any of our Services, we may also collect device information (such as your mobile device ID, model and manufacturer), operating system, and version information;

- **Other information with your consent** including precise geolocation (latitude and longitude) through various means, depending on the service and device you're using, including GPS, Bluetooth or Wi-Fi connections. The collection of your geolocation may occur in the background even when you aren't using the services if the permission you gave us expressly permits such collection. If you decline permission for us to collect your geolocation, we will not collect it; and
- **Information about your past interactions with us** and our Affiliates may be monitored and recorded for training purposes and to ensure a high quality of service; and
- **Geolocation identification services** are used to ensure the accuracy of a users' location. We use Google Maps API to ensure a secure, safe data transfer that is accurate.

4. **Why we collect and use your information**

We may use your information for the following reasons:

- To provide you with our services, and to improve our quality of service and minimize any disruption to the services that we may offer you;
- To satisfy any contractual arrangements we may have with you;
- To confirm your identity;
- To directly or indirectly communicate with you about our services and related offerings;
- To promote or market our services and those of our Partner Hosts and Affiliates;
- To make referrals to Partner Hosts and Affiliates and non-affiliated organizations for other services;
- To process your information with your consent;
- To manage our risks and operations;
- To protect you from unauthorized access or identity theft;
- To establish, exercise or defend legal claims or proceedings;
- To comply with our legal and regulatory obligations under applicable laws;
- To comply with "know your customer" obligations based on applicable anti-money laundering and anti-terrorism requirements, customer due diligence, or other similar laws or regulations;
- To aid in the detection, prevention or suppression of fraudulent or criminal activity; and

- To ensure the validity, accuracy, and identity of you and other users for safety purposes; and
- For other purposes required or permitted by applicable laws and regulations.

5. Consent

Providing us with your information is always your choice. In some cases, we may assume consent when you provide your information directly to us and we use that personal information for purposes reasonably connected to what you've asked us to do (for example when you request a product or service we provide, or when completing a transaction).

You can always retract your consent for future purposes. If you retract your consent, we will respect your choice, subject to our right to continue to use your information to fulfil our contracts with you, collect debts, or otherwise as permitted or required by applicable laws and regulations.

In some limited situations, we may collect and use your information without your consent as permitted or required by law. For example, we may be legally required or permitted to disclose information for our protection (such as collection and fraud prevention) or the protection of others rights and interests without consent, and otherwise to comply with law, regulations or regulatory authority.

6. How we collect your information

Most of the information is collected when you engage with us and our online service platform. For example, we collect information when you:

- Create and operate an online account with us;
- Communicate with us, whether through our online chat, over the phone, by email or in writing;
- Use our website (through cookies, which are files that reside on your computer and contain information about your browsing history); or
- Message our live customer service lines or email our customer service department.

In the course of providing our services, we may also collect financial and other information about you from third parties, including:

- Third-party payment processing services; and
- Third-party verification services.

If you provide information about a third party or authorize a third party to do so, we will assume you have taken proper measures to obtain informed consent.

7. How we use your information

We may use your information for the purposes stated above in Sections 2 and 4, or the purposes communicated to you at the time of collection or in your agreement(s) with us or as otherwise permitted or required by law. In specific cases, we may use your information to:

- Create and manage your account;
- Promote and host Video Speed Dating Events;
- Facilitate payments for our services and complete transactions;
- Display the public fields of your profile to other users <you are matched with>, including: images, name, age, occupation, education, age, bio, sexual orientation;
- Analyze your profile, activity on the service, and preferences to recommend meaningful connections to you and recommend you to others;
- Resolve disputes between you and other users (or with you and a Partner Host);
- Verify your identity and authenticate you when you contact us;
- Communicate with you through various channels including telephone, mail, email, web applications, or mobile applications about our services;
- Provide you with the services we offer;
- Send you information (with your consent) about other products and services that we offer, and related products and services that third parties may offer;
- Conduct statistical analytics and predictive models for legitimate business purposes;
- Manage our risks and operations; and
- Meet our regulatory and legal requirements.

8. Sharing Information

We share your Personal Information for purposes consistent with the terms of this Policy, including the following:

- Operating Firstdate and Video Speed Dating Events Other participants in the Video Speed Dating Event that we believe are as closely matched to your profile and preferences as possible;
- Other users, through your public profile, in the process of providing our services to you and other users;

- Our Partner Hosts, who we may partner with to deliver our services to you;
- Our administrative and technical support providers for the purpose of servicing your account, including cloud storage providers or data analytics providers;
- Third-party marketing and data processing agencies, for the purpose of engaging in marketing services and promotional activities, whether by email or otherwise; and
- Debt collection agencies and related entities, for the purposes of pursuing collection accounts owed to us.

The following are additional circumstances in which we may share your information with third parties. These include:

A. Legal requirements

Subject to applicable law, we may disclose information if required or permitted to by law or regulation or in the good faith belief that such action is necessary to:

- Comply with a legal obligation or in response to a request from public authorities or regulatory bodies to which we are subject;
- Protect and defend our rights or property;
- Detect, prevent or report to law enforcement agencies fraud or other illegal activity;
- Verify identity or conduct required due diligence;
- Act in urgent circumstances to protect the personal safety of our workers/employees, our clients, or the public;
- Protect against any legal liability; or
- As permitted or required by law.

B. Business transfers

From time to time we may sell, buy, restructure or reorganize our business or assets. In the event of any actual or proposed sale, merger, reorganization, restructuring, dissolution or any similar event involving our business or assets, personal information may be shared with the relevant entity or may be part of the transferred assets.

C. Third-party programs

We may from time to time enter into contracts with third parties for programs that provide products and services to our clients.

9. Safeguarding your information

It is important to us that your information is protected. We take the following steps designed to ensure that your information is safe, complete and accurate:

- Physical measures, such as locked filing cabinets and restricted access to physical records;
- Organizational measures, such as security clearances and limiting access on a need-to-know basis; and
- Technological measures, such as securing information by means of data permissioning, passwords and encryption.

A. Employee and third-party access

Your information can only be accessed by employees who have a valid business reason to do so. Our service providers and contractors are also contractually required to maintain the strict information security standards set out in this Policy.

B. Retention policy

We only retain information for as long as necessary for the purposes outlined in this Policy and as otherwise permitted by applicable laws and subject to record-keeping requirements imposed by applicable laws, regulations and business practices.

10. Accessing Your Information

Subject to certain limited circumstances, you may access personal information we hold about you by submitting a written request to us via the contact information provided in Section 11. To enable us to obtain your information in a timely manner, you may be required to provide sufficient information to allow us to identify and authenticate you in order to provide the information you are requesting.

Please note that there may be instances where access to your information may be restricted as permitted or required by law. We will advise you of the reasons for restricting access, subject to any applicable laws or regulations.

11. Age of Majority Required

Our services are restricted to users who are 18 years of age or older. We do not permit users under the age of 18 on our platform and we do not knowingly collect personal information from anyone under the age of 18. If we become aware that a child, minor or anyone under the age of 18 has registered with us and provided us with personal information, we will take steps to terminate that person's registration and delete their registration information from Firstdate. If we do delete a profile because you violated our children's privacy policy, we may retain your email

and IP address to ensure that you do not try to get around our rules by creating a new profile. If you suspect that a user is under the age of 18, please notify us as specified below.

12. Customer inquiries & CPO contact

Tyler Greenberg

tyler@firstdate.co

13. Modifications to this Policy

The date this Policy is effective is noted by the Effective Date at the beginning of this Policy. This Policy may be modified from time to time due to changes in legal or regulatory requirements or for other reasons. We reserve the right to make such changes. The effective date of any such material changes will be noted by the change in the Effective Date at the top of this Policy.

Any material changes will be posted on our website, and we may also notify you by email or other means. Material changes to this Policy will be binding after such changes have been introduced and notice provided. We may assume that you have provided your consent from your continued patronage of our products or services.

14. Governing law

This Policy and any disputes arising from it shall be interpreted in accordance with the laws of the Province of Ontario and all applicable federal laws of Canada.

15. Sharing and Disclosing to Other jurisdictions

Our business relationships may result in your information being stored outside of Ontario and outside of Canada. For example, personal information may be disclosed to Partner Hosts, service providers, affiliated entities or regulatory bodies or other third parties located in other jurisdictions. You acknowledge and agree that your personal information may be processed, used, stored or accessed in other jurisdictions and may be subject to the laws of those jurisdictions. For example, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement agencies in other jurisdictions.